

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

A.B.S., as surviving daughter of deceased )  
ANTHONY L. SMITH, and a minor, by )  
and through her next friend CHRISTINA )  
WILSON, )

Plaintiff, )

Case No.: 4:12-cv-00202-JCH

v. )

BOARD OF POLICE COMMISSIONERS, )  
et al., )

Defendants. )

**RESPONSE OF RESPONDENT ST. LOUIS BOARD OF  
POLICE COMMISSIONERS TO PLAINTIFF'S  
MOTION TO ENFORCE SETTLEMENT(DOC. 228)**

COMES NOW, Respondent St. Louis Board of Police Commissioners (“the Board”), and states as follows in response to Plaintiff’s Motion to Enforce Settlement (doc. 228) out of time:

1. The material details of the settlement terms and provisions as agreed by counsel for all parties are accurately described in the Plaintiff’s Motion to Enforce Settlement and the exhibits to said Motion.

2. The Board concurs with all material statements within Plaintiff’s Motion to Enforce Settlement regarding the settlement discussions and agreed upon terms.

3. Exhibit 3 to Plaintiff’s Motion to Enforce Settlement is a true and accurate copy of the Settlement Agreement agreed upon by all parties.

4. The Board joins in seeking enforcement of the terms and provisions contained in Exhibit 3 to Plaintiff’s Motion to Enforce Settlement.

Respectfully submitted,

JULIAN BUSH  
CITY COUNSELOR

By: /s/ Michael A. Garvin  
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Attorney for the Board of Police Commissioners

**CERTIFICATE OF SERVICE**

I hereby certify that on May 24, 2019 the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system on all attorneys of record.

/s/ Michael A. Garvin